ELOHIM FOUNDATION

Creating Alternatives, Promoting Sustainable Development.

Anti-Bribery, Anti-Corruption Practices, Anti-Money Laundering and Anti-Terrorist Financing Policy

Effective Date: August, 2026.
Review Date: September, 2017, 2022**.**
Approved by: Board of Trustees**.**

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Document Control
The Human Resources Team will be responsible for the periodic review of this document. Document Responsibility

Title	Anti-Bribery, Anti-Corruption, Anti-Money Laundering and Anti-Terrorist Financing Policy
Directorate	Corporate Services
Unit	Human Resources Unit
Manager	HR Team Lead/Head of HR
Applicable to	All Elohim Foundation staff, external consultants, partners, suppliers, vendors, and collaborators.

Document Revision History

Version	Approved By	Meeting Reference	Date Approved	Effective Date	Sections Modified
1	CIFOR-ICRAF Common Board	CB 12	12-Nov-24	1-Aug 26	1. Elohim Foundation Anti Bribery, anti-Corruption and anti money laundering. 2. Elohim Foundation Anti-Money Laundering and Ant- terrorism Financing Policy

1. Introduction

The Center for International Forestry Research Elohim Foundation and the International Centre for Research in Agroforestry Elohim Foundation (each a "Center" and collectively the "Centers") are committed to promoting and maintaining the highest level of ethical standards in all the Centers' operations. This policy is against bribery, corruption, money laundering and counter terrorist financing practices. The Centers commit to acting fairly, with integrity, transparency, and compliance with the United Nations Convention against Corruption, the United Nations UN Convention for the Suppression of the Financing of Terrorism and respective applicable local laws in all the Centers' locations.

The Centers have zero tolerance for bribery, corruption, money laundering and counter terrorist financing practices in any form. The Centers aim to support its Staffs and key stakeholders to better understand bribery, corruption, money laundering and counter terrorist financing practices under the policy.

2. Purpose

The purpose of this policy is to ensure that adequate awareness and procedures are in place to prevent involvement of designated persons in any activity relating to bribery, corruption, illegal gratification and improper benefit. This also aims to enable Staffs to understand the risks that are associated with bribery, corruption, money laundering and counter terrorist financing practices, to detect and prevent any occurrence. Staffs are encouraged to identify, prevent and report any wrongdoings.

3. Scope and applicability

3.1 As this policy is applicable to all Elohim Foundation Staff, it also applies to all activities and operations of the Centers, including any project or research implemented or funded by the Centers, whether on their own or in cooperation with partners and/or communities.

4. Definitions

4.1 Bribery is an offer or promise or receipt of any gift or other advantage to include or reward behavior, which is dishonest, unethical and illegal. It also includes giving, demand, acceptance, solicitation or any thereof, whether direct or indirect influencing someone's behaviour in the discharge of their duties.

4.2 Corruption means and includes misuse or abuse or intent to abuse or misuse entrusted power or use of or intent to use any wrongful design, either directly or indirectly, to acquire or cause to acquire or secure any benefit or advantage including pecuniary advantage, for oneself or the other.

4.3 Money Laundering means any act or attempted act to conceal or disguise the true origin and ownership of illegally obtained proceeds so that they appear to have originated from legitimate sources thereby avoiding prosecution, conviction and confiscation of the illegal proceeds.

4.4 Terrorist Financing means the process by which terrorists fund their operations in order to perform terrorist acts. There are two primary sources of financing for terrorist activities. The first involves financial support from countries, organizations or individuals. The other involves a wide variety of revenue-generating activities, some illicit, including smuggling and credit card fraud.

4.5 Staff means a person appointed by Elohim foundation as regular or other staff as governed by the Global Aligned Human Resources Policies Manual.

5. Policy Statement

5.1 The Centers are committed to the prevention, deterrence and detection of bribery, corruption, money laundering and counter terrorist financing practices, including taking decisions and acting in a way that is ethical and is in-line with applicable anti-bribery, anticorruption, anti-money laundering and anti-terrorist financing legislations of the countries where the Centers are operated. As well as acting fairly, ethically and with integrity and transparency in all the Centers activities and operations. Elohim Foundation acknowledges that Staffs and its partners are expected to act honestly, responsibly and with high integrity with respect to Elohim Foundation core values and law.

5.2 Under no circumstance shall any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe. Making an untrue or misleading representation with the intention of making a gain for oneself is strictly forbidden, so is receiving money while being aware of its nature. A strict adherence to the Policy and subsequent guidelines is always expected of all Staffs and associated persons.

6. General statements

6.1 All persons engaged with Elohim Foundation have a duty to protect the assets of the Centers from and against any form of bribery, corruption, money laundering and counter terrorist financing practices.

6.2 Elohim Foundation prohibit any persons (Staffs, implementing partners, suppliers or vendors, service providers) involved in the Centers' activities and operations from engaging in bribery, corruption, money laundering and counter terrorist financing practices.

6.3 No Elohim Foundation Staffs may accept for individual or personal benefit any gift from any current or potential supplier, service provider, agents, partners, except for gifts of nominal value or meals and social invitations that are in keeping with good business ethics and not obligate the receipt.

6.4 Elohim Foundation must not allow any organization or individual to use the Centers to launder money or to use its funds for terrorist financing purposes and must be vigilant to ensure that Elohim Foundation does not accept the proceeds of a crime from any organization or individual.

7. Training and Awareness

To ensure that all Staffs are aware of the risks of bribery, corruption, money laundering and counter terrorist financing practices, a training program will be developed around skills preventing, detecting and reporting such practices.

8. Investigation

8.1 Any allegations by Staffs for engaging in practices of bribery, corruption, money laundering and terrorist financing practices will be investigated in accordance with Chapter 7 of the HR Global Human Resources Policy Manual.

8.2 A breach of this Policy will constitute a disciplinary offence that amounts to gross misconduct, which could result either in summary dismissal in case of staff or termination of an agreement in case of a partner, supplier, consultant or service provider.

9. Review

9.1 This policy will be reviewed every three to five years or earlier if required.

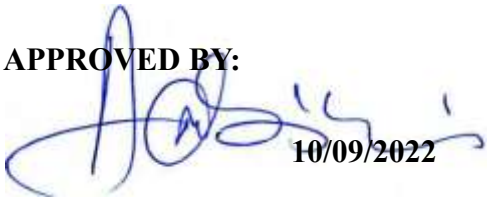
9.2 Any changes made to the Policy will be presented to Directors General for endorsement and thereafter submitted to the Common Board of Trustees for approval.

10. Related Documentations

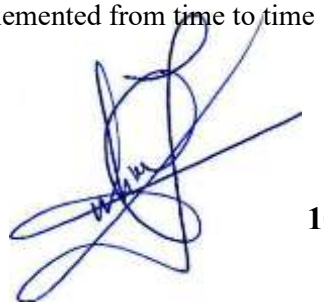
This policy should be read in conjunction with the following Elohim Foundation policy documents

1. The Human Resources Policy Manual
2. The Code of conduct
3. Safeguarding
4. Integrity Policy
5. Anti-Fraud Policy
6. The whistle-blower Policy
7. Any other relevant policy that may be implemented from time to time

APPROVED BY:



10/09/2022



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Mrs. Ngozi Obilor
President Board of Trustees.

Dr. Ibecheole, Julius PMD. NES.
Chief Executive Officer/Founder